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Attorneys for Defendants
 UBER TECHNOLOGIES, INC.;
 RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MAUREEN
 FRANGOPOULOS IN SUPPORT OF
 DEFENDANTS' DECEMBER 12, 2024
 JOINT LETTER BRIEF ON PRIVILEGE
 SAMPLING DISPUTE**

This Document Relates to:

 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
 Courtroom: G – 15th Floor

1 **DECLARATION OF MAUREEN FRANGOPOULOS**

2 I, Maureen Frangopoulos having personal knowledge of the following state:

3 1. I am the Senior Legal Director, Central Strategy and Special Matters, Global, at Uber.
4 I was first employed by Uber in August 2015 and I have worked as an in-house legal counsel for the
5 past 9 years. My previous positions at Uber included Counsel, Insurance; Senior Counsel, Insurance;
6 Director, Safety & Insurance; Senior Legal Director, Safety and Insurance Litigation, U.S. and
7 Canada; and Senior Legal Director, Global Safety & Insurance Litigation. For my entire tenure at
8 Uber my job roles in these positions were in a capacity to provide legal advice to Uber and its
9 employees.

10 2. Currently, I am responsible for providing legal advice to Uber's leadership and
11 employees related to safety and insurance issues, procedures, and policy, among other legal advice. I
12 am licensed to practice law in the State of Illinois. I am offering this Declaration in the above-
13 captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA,
14 LLC's submission in the December 12, 2024 privilege sampling dispute. In particular, I address herein
15 documents referred by privilege log numbers as JCCP_MDL_PRIVLOG036737 and
16 JCCP_MDL_PRIVLOG039202. The facts set forth herein are true and correct and are based on my
17 own personal knowledge, and I could and would competently testify thereto if called.

18 3. I am familiar with the document referenced as JCCP_MDL_PRIVLOG036737. This
19 document is an email chain discussing proposed communications with potential claimants to be made
20 by a third-party claims administrator. The email chain was initiated by Uber in-house legal counsel
21 Lauren Shapiro Uber's Director, Safety & Insurance Litigation, Special Matters, U.S. and Canada,
22 Katie Waitzman, Uber's Vice President and Chief Deputy General Counsel, and myself. Ms. Shapiro
23 is a former in-house attorney of Uber and reported to me through most of her tenure at Uber and
24 specifically at the time of this email. In her initial email, Ms. Shapiro provided her legal advice
25 concerning the draft proposed communication with potential claimants and Ms. Shapiro expressly
26 asked for thoughts from the other email participants, including legal counsel Ms. Waitzman and
27 myself. The subsequent emails sent by participants in the communication with legal counsel include
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1 Andrew Hasbun, Safety Communications Manager, Steffi Bryson, Head of Safety and Consumer
2 Protection Policy, and Tracey Breeden, Head of Global Women's Safety & Gender-based Violence
3 Initiatives. In their communications with legal counsel in this email thread, these participants also
4 discuss or relay Ms. Shapiro's legal advice when responding to questions and giving input back to
5 counsel to form legal opinions and advice to Uber. In this context, Uber's in-house counsel
6 participants, including myself, were providing legal guidance (and receiving information from
7 conversation participants to form that guidance) in light of the many legal risks involved in
8 communicating with a potential claimant.

9 4. I am familiar with the document referenced as JCCP_MDL_PRIVLOG039202. This
10 is a document that I drafted in March 2016. The document conveys legal advice for Uber employees
11 that receive safety-related incident reports. The document details best practices for documenting and
12 communicating about incident reports. I also give legal guidance in this document on contacting the
13 legal department to seek further legal advice regarding particular incident reports. I specifically recall
14 creating this document to provide legal guidance to Uber employees about how to handle incident
15 reports in anticipation of litigation related to the incidents. I did not intend this document to reflect
16 my business advice or judgment.

17 I declare under penalty of perjury that the foregoing is true and correct.

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19 Executed in Cincinnati, Ohio on December 11, 2024.

By: Maureen Frangopoulos

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